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July 7, 2023

VIA ECF

The Honorable Vincent L. Briccetti
United States District Judge
United States Courthouse
300 Quarropas Street, Room 630
White Plains, New York 10601

Re: *In Re USAA Data Sec. Litig.*, Case No. 7:21-cv-05813-VB (S.D.N.Y.)

Judge Briccetti:

As ordered by the Court on June 12, 2023 (Dkt. 59), the parties jointly submit this letter concerning the status of settlement discussions. As previously reported, after having sufficient discovery to allow for meaningful discussions, the parties conducted an in-person mediation on June 5, 2023 with Judge Diane M. Welsh (Ret.) of JAMS. Although the parties did not resolve the case on June 5, they did make considerable progress and are continuing those discussions via the continued facilitation of the mediator. That progress has continued but has not yet concluded. The parties believe, however, that they will be able to conclude these negotiations by the end of July.

In the meantime, the parties write to request a short one-month adjournment of all current discovery deadlines to give the parties additional time to determine whether the case can be resolved without incurring unnecessary discovery costs. The parties appreciate the Court's patience during these negotiations and intend for this to be their last settlement-related extension request. The current or previously identified deadlines are shown in the chart below with the proposed new deadlines:

Current/Previously Identified Deadline:	Extended to:
All fact discovery (as to class certification) shall be completed by October 30, 2023.	November 30, 2023
Non-expert depositions shall be completed by October 30, 2023.	November 30, 2023



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Current/Previously Identified Deadline:	Extended to:
All expert discovery, including expert depositions, in support of class certification shall be completed by January 22, 2024.	February 22, 2024
Plaintiff's expert disclosures in support of class certification shall be made by November 5, 2023.	December 5, 2023
Defendant's expert disclosures in support of class certification shall be made by January 9, 2024.	February 9, 2024
Plaintiffs' Motion for Class Certification shall be filed February 21, 2024.	March 21, 2024
Defendant's Response to Plaintiffs' Motion for Class Certification shall be filed by March 29, 2024.	April 29, 2024
Plaintiffs' Reply in Support of Class Certification shall be filed by April 5, 2024.	April 26, 2024
Status Conference scheduled for December 21, 2023 at 10:00 AM, Courtroom 620, 300 Quarropas St., White Plains, NY 10601.	No change

The parties will respectfully provide another update to the Court on or before August 1, 2023.

/s/ Armin Ghiam

cc: All Counsel of Record (via ECF)